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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:
PROFESSIONAL OFFSHORE	
OPPORTUNITY FUND, LTD., a company	: 08-CIV-5643 (SAS)
registered under the laws of the British Virgin	
Islands,	:
	:
Plaintiff,	: <b><u>NOTICE OF</u></b>
	: <b><u>MOTION FOR DEFAULT</u></b>
-against-	:
	:
AMEREX GROUP, INC., a Delaware	: ECF CASE
corporation,	:
	:
Defendant.	:
	:
-----	X

**PLEASE TAKE NOTICE THAT** plaintiff Professional Offshore Opportunity Fund, Ltd., by its undersigned counsel, Sullivan & Worcester LLP, moves this Court for entry of default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure against defendant Amerex Group, Inc.

**PLEASE TAKE FURTHER NOTICE THAT** plaintiff submits a memorandum of law and the Declaration of Gretchen S. Silver in support of its motion.

**PLEASE TAKE FURTHER NOTICE THAT** plaintiff also submits a proposed default judgment.

**PLEASE TAKE FUTHER NOTICE THAT** plaintiff served this motion by overnight courier on Amerex Group, Inc., to the attention of Nicolas Malino, at 1105 N. Peoria Avenue, Tulsa, Oklahoma 74106.

Dated: New York, New York  
July 24, 2008

SULLIVAN & WORCESTER LLP

By: /s/  
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*Attorneys for Plaintiff Professional Offshore  
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